

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

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D. JOSEPH KURTZ, Individually and on : Civil Action No. 1:14-cv-01142-PKC-RML
Behalf of All Others Similarly Situated, :
 : CLASS ACTION
 :
Plaintiff, :
 :
vs. :
 :
KIMBERLY-CLARK CORPORATION, et al., :
 :
Defendants. :
 :
_____ :

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GLADYS HONIGMAN, Individually and on : Civil Action No. 1:15-cv-2910-PKC-RML
Behalf of All Others Similarly Situated, :
 :
Plaintiff, :
 :
vs. :
 :
KIMBERLY-CLARK CORPORATION, et al., :
 :
Defendants. :
 :
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**SUPPLEMENTAL DECLARATION OF SCOTT M. FENWICK
OF KROLL SETTLEMENT ADMINISTRATION LLC
IN CONNECTION WITH FINAL APPROVAL OF SETTLEMENT**

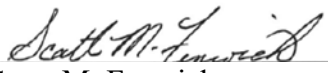
INTRODUCTION

1. I am a Senior Director at Kroll Settlement Administration LLC (“Kroll”),¹ the Claims Administrator appointed in the above-captioned case, whose principal office is located at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working under my general supervision. This supplemental declaration is being filed in connection with final approval to address the inadvertent omission of the dollar amount of claims received to date.

2. As of August 30, 2022, Kroll has received 808 timely Claim Forms and 21 late Claim Forms through the mail and 184,546 Claim Forms filed electronically through the Settlement Website. Kroll is still in the process of reviewing and validating claims.

3. Of the 185,375 claims received, 179,902 are “Option A” claims, which do not require a Proof of Purchase. Currently, the total value of the “Option A” claims is \$1,103,511.50. A total of 5,473 “Option B” claims have been filed, which require a Proof of Purchase. Currently, the total value of the “Option B” Claims is \$250,756.00. The aggregate value of claims received is \$1,354,267.50. As noted above, Kroll is still in the process of validating claims, so the number of valid claims and value of the claims is subject to change.

4. I declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on September 1, 2022, in Woodbury, Minnesota.


Scott M. Fenwick

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Settlement Agreement.